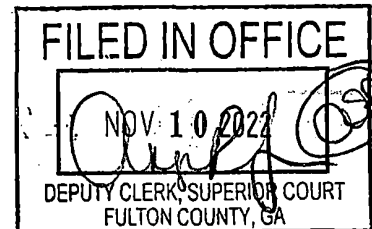


## **EXHIBIT B-121**

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA



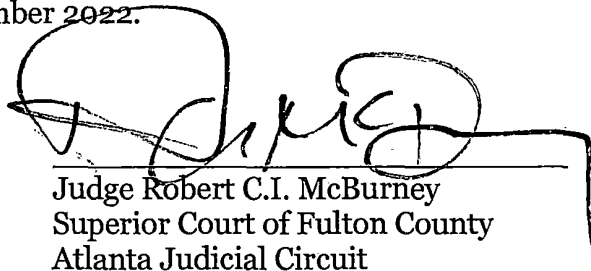
IN RE 2 MAY 2022 SPECIAL PURPOSE  
GRAND JURY

2022-EX-000024

**ORDER SEALING PLEADING**

The attached pleading, a response to the District Attorney's motion to disqualify counsel, is being filed under seal. Concomitantly with this sealed filing, the Court is filing an unsealed redacted version of the same pleading. The Court has reviewed the attached pleading and assessed the proposed (and accepted) redactions; it now finds that the District Attorney's compelling interest in protecting the ongoing investigation into possible criminal electoral interference is sufficient to justify sealing the unredacted motion. *See United States v. Valenti*, 987 F.2d 70, 714 (11<sup>th</sup> Cir. 1993); *In re Four Search Warrants*, 945 F. Supp. 1563 (N.D. Ga. 1996). The Court additionally finds that the redacted portions of the response -- containing sensitive, non-public investigative information -- "are not subject to disclosure under [Uniform Superior Court Rule] 21 because they do not fall within that which USCR 21 embodies: they are not court records to which the public and press in Georgia have traditionally enjoyed access." *In re Gwinnett Cnty. Grand Jury*, 284 Ga. 510, 512 (2008).

SO ORDERED this 10<sup>th</sup> day of November 2022.



Judge Robert C.I. McBurney  
Superior Court of Fulton County  
Atlanta Judicial Circuit